

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on First-Class Mail
Service Standards

Docket No. C2001-3

DOUGLAS F. CARLSON
MOTION FOR LEAVE TO AMEND COMPLAINT

August 11, 2001

I move for leave to amend my complaint to allege that the changes in service standards implemented in 2000 and 2001 lead to violations by the Postal Service of 39 U.S.C. §§ 101(e) and (f). Section 101(e) states:

In determining all policies for postal services, the Postal Service shall give the highest consideration to the requirement for the most expeditious collection, transportation, and delivery of important letter mail.

Section 101(f) states, in part:

In selecting modes of transportation, the Postal Service shall give highest consideration to the prompt and economical delivery of all mail and shall make a fair and equitable distribution of mail business to carriers providing similar modes of transportation services to the Postal Service.

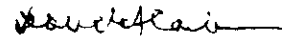
Paragraph 18 of the Declaration of Charles M. Gannon¹ reveals that the Postal Service has changed the definition of two-day First-Class Mail to exclude the use of air transportation for most or all mail for which a two-day delivery standard applies. If mail between a particular origin and destination cannot be transported by surface transportation to meet a two-day delivery standard, the Postal Service changed the delivery standard to three days. As a result of paragraph 18, I have formed a reasonable belief that the new definition of the

¹ Declaration of Charles M. Gannon, filed July 30, 2001.

two-day First-Class Mail delivery area is inconsistent with 39 U.S.C. §§ 101(e) and (f). Therefore, I move for leave to amend my complaint.

If this motion is granted, I will file a page 16 of my complaint showing a new paragraph 66 containing this allegation.

Respectfully submitted,

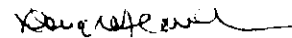


Dated: August 11, 2001

DOUGLAS F. CARLSON

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the Postal Service in accordance with section 12 of the *Rules of Practice*.



DOUGLAS F. CARLSON

August 11, 2001
Omaha, Nebraska